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*Rejected -
Defendant must refile
with sources for each
jury instruction.*

4/13/12

*Lucy # Koh
U.S. District Judge*

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN JOSE DIVISION

14 UNITED STATES OF AMERICA,

15 *Plaintiffs,*

16 v.

17 RANDY W. GOLDBERG,

18 *Defendant.*

CASE № CR-07-00788-LHK

**DEFENDANT GOLDBERG'S
PROPOSED
JURY INSTRUCTIONS**

19 The Defendant, RANDY GOLDBERG, by and through his undersigned counsel,
20 respectfully files his list of proposed jury instructions¹ in the instant cause.

21 **1. PRELIMINARY INSTRUCTIONS**

22 **1.1 DUTY OF JURY**

23 Jurors: You now are the jury in this case, and I want to take a few minutes to tell you
24 about your duties as jurors and to give you some preliminary instructions. At the end of the
25 trial I will give you more detailed [written] instructions that will control your deliberations.

26 When you deliberate, it will be your duty to weigh and to evaluate all the evidence

27 ¹ MR. GOLDBERG reserves the right to file amended and additional jury
28 instructions, including a theory of defense instruction.